## **EXHIBIT** C

### AFFIDAVIT

STATE OF NEW YORK	)
	) ss.
COUNTY OF ROCKLAND	)

WILLIAM FRENCH, being duly sworn, deposes and says:

- 1. I am the Pastor of Grace Baptist Church (the "Church"), located at 20 Demarest Avenue, Nanuet, New York. I have been the Pastor of the Church since October 2010. As such, I am fully familiar with the facts herein, and, as to those facts about which I do not have personal knowledge, I have relied on the books and records of the Church and on historical records made available to me. Among the historical records I used was "Changing Times and a Changeless Message; Grace Baptist Church of Nanuet, 1798-1993", an article written by Judy Marolewski in South of the Mountain published by the Rockland County Historical Society, and I Will Build My Church, a book which traced the Church's history, published to coincide with the Church's 175th anniversary in 1973.
- 2. The Church was established at its current site in 1860, having been located elsewhere after its founding in 1798. The original 1860 building, housing the old sanctuary, still exists, and has been added to over time. The first addition, initially used as an educational wing and now housing the nursery and library, was built in 1928. The new educational wing was built in 1955. The new sanctuary was added in 1965.
- As time went on, the Church's membership declined, and it found that it needed
  financial help to maintain its campus. Additionally, the Church did not want to see
  its campus underutilized.
- 4. The initial outside churches to use the Church's buildings were Siloam Alliance
  Church (also known as Good Shepherd Church) and the International Christian

Fellowship, beginning in the 1990s. The Church then rented space to All Souls Community Church, Ministerio Bethel International, Iglesia Bautista Monte Calvario, Harvest Chapel International, and Church Jesus Christ Buildeth for various periods between 2009 and 2017. These churches conducted worship and religious educational programs on various days and at various times during the day, throughout the week.

- 5. Even before the outside churches rented space, the Town of Clarkstown Park Board and Recreation Commission rented two classrooms in "the Educational Building", beginning in September 1988 for a "Pre-school Recreational Program", to be used 8:30 am to 12:30 pm, any day but Sunday.
- 6. At the same time that the Church rented space to outside groups, it continued to use the same spaces for its own purposes. These include regular worship services, bible studies, musical and theological instruction, ministries, membership and baptism classes, vacation bible school, and other religious and religious education programs.
- 7. All of the aforementioned programs, including those run by the Church and those run by renters, occurred on all days of the week. They occurred during both daytime and evening hours. The times and days of each program were tailored to the audience it was intended to reach.
- 8. According to the Marolewski article the Church was conducting educational programs at its previous location as early as the 1828. In that year, the Church's pastor introduced the first Sunday School program in Rockland County. Those programs were continued after the Church moved to its current Demarest Avenue campus about 1860.
- 9. Daily Vacation Bible School was introduced in the 1920s and continued until 2016.

10. The popularity of these educational programs continued to grow; sparking the

construction of the original educational wing in 1928. By the 1950s, the original

wing was outgrown, resulting in the new educational wing in 1955.

11. I Will Build My Church discussed the construction of the original educational wing

in some detail. It described rooms for various younger grades, as well as for "the

Young Women and the Young Men." The building and furnishings cost \$61,000 in

1928-29 (just over \$900,000 in 2018 dollars).

12. In addition to church members, students from Lakeside School in Spring Valley

were transported to the campus for Sunday School.

13. Beyond Sunday School programs and Vacation Bible School, the campus hosted

released-time classes during the week for children of church members.

14. In 1955, the new educational wing was begun. It contains 9 large classrooms that

contain 40 smaller classrooms within them.

15. Attached as Exhibit A are schematic diagrams of the Church's buildings showing the

current layout and room usages. The new educational wing, at top on both the first

and second floors, has extensive dedicated classroom space.

16. Church records as to programming are scarce. However, I was able to review

building use records from 2015 going forward. A summary is attached as Exhibit B.

17. It is clear that the buildings have been used for both worship and religious education

on a regular basis since 1860, and that two purpose-built educational wings were

added, first in 1928 and then in 1955.

Sworn to before me this

28 day of November

Notary Public

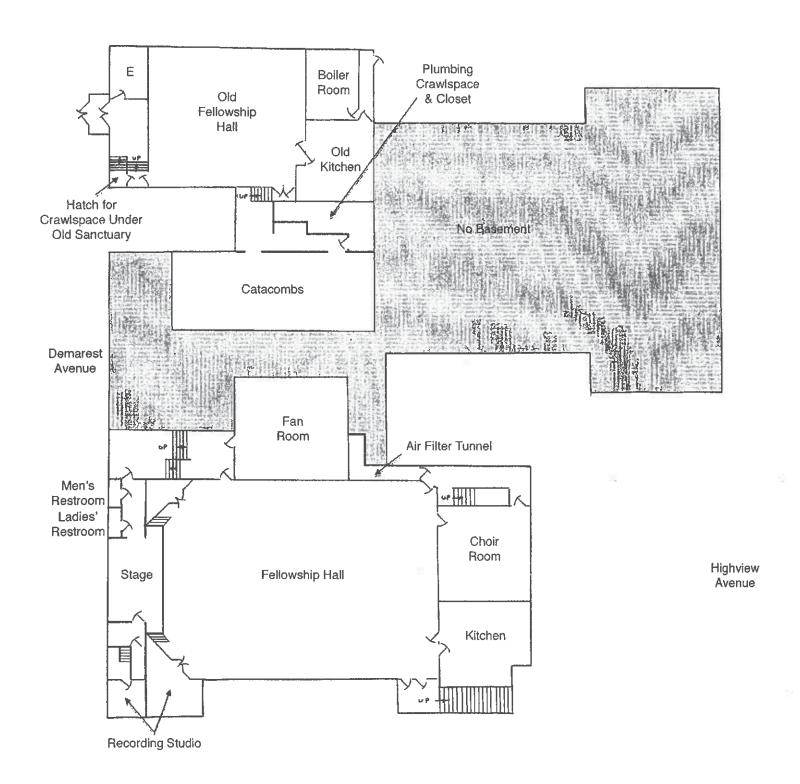
BETSABE CASTILLO

tary Public State of New York NO. 01CA6145121

Qualified in Rockland County Term Expires May 1st 20 22

## **Basement**

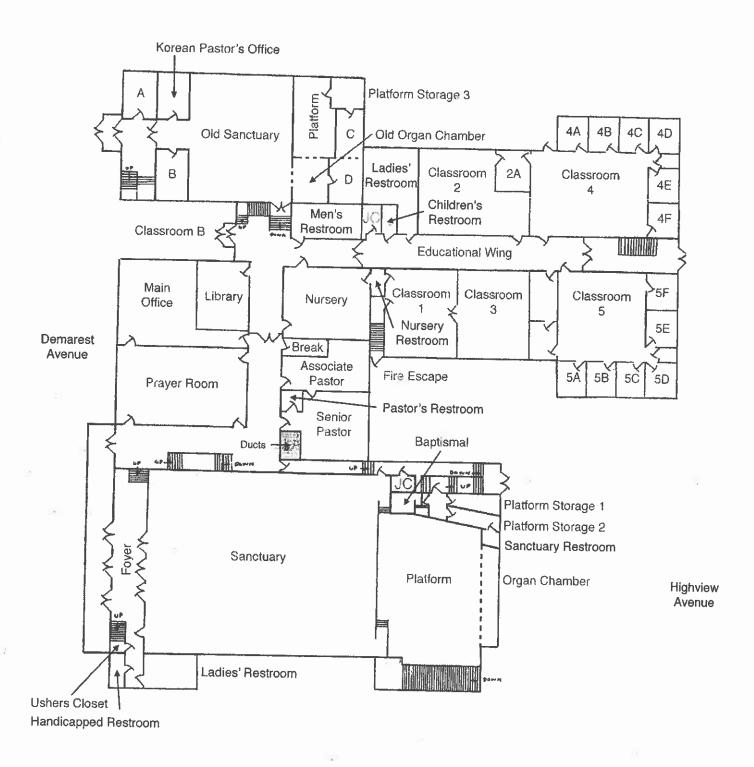
### **Orchard Street**



Main Parking Lot (South Lot)

## 1st Floor

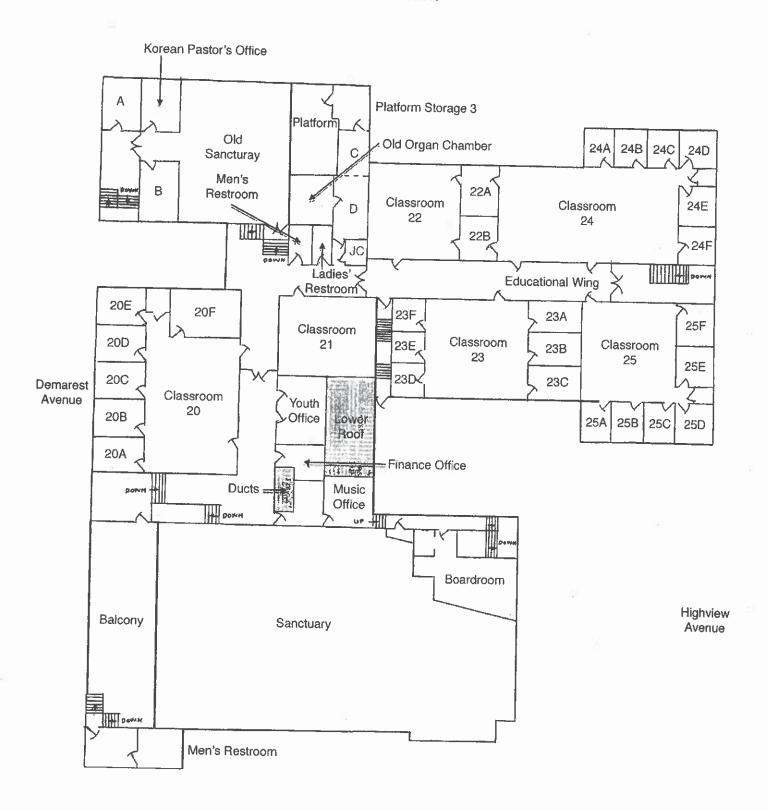
**Orchard Street** 



Main Parking Lot (South Lot)

## 2nd Floor

**Orchard Street** 



Main Parking Lot (South Lot)

# Building Usage Summary 2015-2018

#### 2018

- One-on-One Discipleship and Pastoral Counseling
- Wednesday Night Bible Study (Infrequent)
- Musical and Theological Instruction (Thursday Nights)
- Weekly Staff Meeting and Prayer (Thursdays)
- Board Meetings with Bible Study and Prayer
- Wednesday Morning Bible Study

### 2017

- Saturday Night, Sunday Morning, Sunday Afternoon, Sunday Night, and Monday Night Worship
   Services
- Holiday Worship Services
- Adult and Children's Sunday School Classes (Sunday Morning, Sunday Afternoon, Sunday Night)
- Nursery and Childcare (Sunday Morning)
- Men's Ministry with Breakfast, Biblical and Theological Education, Prayer (Saturdays)
- Women's Ministry with Breakfast, Theological Education, Prayer (Saturdays during the Summer)
- One-on-One Discipleship, Training, and Teaching (1-2 Times Per Week)
- Wednesday Night Bible Study (Infrequent)
- Musical and Theological Instruction (Thursday Nights)
- Weekly Staff Meeting and Prayer (Thursdays)
- Membership and Baptism Classes (As Needed)
- Wednesday Morning Bible Study
- Board Meetings with Prayer
- Operation Christmas Child (November)
- Ecumenical Prayer Service
- Wednesday Morning Bible Study
- Morning Prayer Service (Weekdays)
- Children's Korean Language Instruction (Saturdays)
- Choir Rehearsal (Sundays)

### 2016

- Saturday Night, Sunday Morning, Sunday Afternoon, Sunday Night, and Monday Night Worship Services
- Holiday Worship Services
- Adult and Children's Sunday School Classes (Sunday Morning, Sunday Afternoon, Sunday Night)
- Nursery and Childcare (Sunday Morning)
- Men's Ministry with Breakfast, Biblical and Theological Education, Prayer (Saturdays)
- One-on-One Discipleship, Training, and Teaching (3-4 Times Per Week)
- Wednesday Night Bible Study (Weekly)

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- Musical and Theological Instruction (Thursday Nights)
- Weekly Staff Meeting and Prayer (Thursdays)
- Membership and Baptism Classes (As Needed)
- Vacation Bible School (July)
- Wednesday Morning Bible Study
- Board Meetings with Prayer
- Operation Christmas Child (November)
- Ecumenical Yard Sale (October)
- Wednesday Morning Bible Studies
- Morning Prayer Service (Weekdays)
- Children's Korean Language Instruction (Saturdays)
- Choir Rehearsal (Sundays)
- Life Line Screening (May)

### 2015

- Saturday Night, Sunday Morning, Sunday Afternoon, Sunday Night, and Monday Night Worship Services
- Holiday Worship Services
- Adult and Children's Sunday School Classes (Sunday Morning, Sunday Afternoon, Sunday Night)
- Nursery and Childcare (Sunday Morning)
- Men's Ministry with Breakfast, Biblical and Theological Education, Prayer (Saturdays)
- One-on-One Discipleship, Training, and Teaching (3-4 Times Per Week)
- Wednesday Night Bible Study (Weekly)
- Musical and Theological Instruction (Thursday Nights)
- Weekly Staff Meeting and Prayer (Thursdays)
- Membership and Baptism Classes (As Needed)
- Vacation Bible School (July)
- Board Meetings with Bible Prayer
- Operation Christmas Child (September November)
- Ecumenical Yard Sale (October)
- Wednesday Morning Bible Studies
- Morning Prayer Service (Weekdays)
- Children's Korean Language Instruction (Saturdays)
- Choir Rehearsal (Sundays)